

TABLE 2. SUMMARY OF RECORDKEEPING AND REPORTING REQUIREMENTS

Requirement	All Options		Option 1		Option 2		Option 3	
	Rec	Rep	Rec	Rep	Rec	Rep	Rec	Rep
Initial Notification (§ 63.9(a)-(d))	T	T						
Implementation plan (§ 63.787(b))	T	T						
Volume of coating applied at unaffected major sources (§ 63.781(b))	T							
Volume of each low-usage-exempt coating applied at affected sources (§ 63.781(c))	T	T						
ID of the coatings used, their appropriate coating categories, and the applicable VOHAP limit	T	T						
Determination of whether containers meet the standards described in § 63.783(b)(2)	T	T						
Results of M-24 or other approved tests	T	T						
Certification of the as-supplied VOC or VOHAP content of each batch	T							

switching to lower VOC/VOHAP coatings. There are many other *pollution prevention* options for the

625/7-91/015) in October 1991. Some of the documented options include the use of reformulated coatings and/or solvents with lower or no HAP materials, and recycling of solvent waste from painting and cleaning activities. There are work practice standar

using lower VOHAP/VOC paints; some facilities may adopt add-on controls. EPA's accompanying guidebook provides more detailed information on the cost impacts associated with the regulation.

<WHAT POLLUTION PREVENTION OPTIONS EXIST?

The entire regulation is based on *pollution prevention* with the marine coating limits based on

shipbuilding and ship repair industry. The EPA published "Guides to Pollution Prevention--The Marine Maintenance and Repair Industry" (EPA/

approximately \$58,000/yr to comply with the regulation. Most shipyards are expected to comply

<http://ttnwww.rtpnc.epa.gov>. Assistance with the TTN is available by calling (919) 541-5384.

The EPA is divided into 10 geographic regions. You may also call the Regional Office for your State or territory for more information about this regulation.

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**New Regulation
Controlling Air
Emissions from
Shipbuilding and
Ship Repair
Surface Coating
Operations**

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